

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF TENNESSEE

In re: Keith Ricardo Miles and Virginia Ann Miles
Debtor(s)

Case No. 3:09-05187
Chapter 7
Judge: Randal S. Mashburn

MOTION TO WITHDRAW UNCLAIMED FUNDS

COMES NOW, Dilks & Knopik, LLC, as assignee of LHR, Inc., through local counsel, Holly Schumpert, moves this Court for an order directing the Clerk to remit to the applicant the sum of \$1,258.92, which was deposited into the Treasury of the United States as unclaimed funds for LHR, Inc. ("Claimant").

Applicant certifies, under penalty of perjury, that:

- (1) Applicant has conducted a reasonable investigation.
- (2) The money on deposit with the Treasury of the United States is owed to Claimants.
- (3) The funds sought have not been paid to Claimants or to any agent on Claimants' behalf.
- (4) Applicant has authority to collect the funds on behalf of the Claimant as evidenced by the attached original Limited Power of Attorney from Claimant or authorized representative of Claimant.
- (5) No other motion is pending the recovery of the same unclaimed funds.
- (6) Applicant has complied fully with requirements of 28 U.S.C. §2042.

Dated: October 28, 2016

Respectfully Submitted,

/s/ Holly W. Schumpert
Holly W. Schumpert #15658
2552 Poplar Avenue, Suite 4F
Memphis, TN 38112
(901) 323-9000
holleyschumpert@att.net

Attachments:

- (1) **Power of Attorney** or other proof if Claimant is represented by an agent or attorney.
- (2) **Proof of identity:** If Applicant is the Claimant and if the Claimant is an individual, a copy of the individual's driver's license or other photo identification.
- (3) **Proof that the funds are owed to Claimant:** Any supporting documentation that proves the claimant is entitled to the funds requested. This can be in the form of a copy of the proof of claim, the trustee's report of unclaimed funds, or the Order of Distribution.

CERTIFICATE OF SERVICE

I hereby certify that in the 28th day of October, 2016, I caused to be mailed a copy of the foregoing by E-mail, Fax or U.S. Mail, first class, postage pre-paid to:

Keith Ricardo Miles and Virginia Ann Miles, 3013 Lakeland Dr., Nashville, TN 37214;

David Foster Cannon, Esq., 346 21st Ave., N., Nashville, TN 37203;

Case Trustee David Rogers, 7100 Executive Center Sr., Suite 120, Brentwood, TN 37027

Dillks & Knopik LLC, 35308 SE Centre St., Snoqualmie, WA 38065

LHR, Inc. assignee of Juniper Bank, 56 Main St., Hamburg, NY 14075

LHR, Inc., 3176 Abbot Rd., Orchard Park, NY 14123

Asst. U.S. Attorney, 110 9th Avenue South, Suite #A-961, Nashville, TN 37203

U.S. Trustee, 701 Broadway, Customs House, Suite #318, Nashville, TN 37203

Clerk of Court, Attn: Financial Section, Room 200, 2nd Floor, Customs House, 701 Broadway, Nashville, TN 37203

/s/ Holly W. Schumpert

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